

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN UTESCH, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

LANNETT COMPANY, INC., ARTHUR P.
BEDROSIAN, and MARTIN P. GALVAN,

Defendants.

Civil Action No. 2:16-cv-05932-WB

ORAL ARGUMENT REQUESTED

Judge Wendy Beetlestone

MOTION FOR CLASS CERTIFICATION

Lead Plaintiff University of Puerto Rico Retirement System (“Lead Plaintiff”) and plaintiff Ironworkers Locals 40, 361 & 417 Union Security Funds (collectively, “Plaintiffs”), respectfully move this Court, pursuant to Rules 23(a), (b)(3), and (g) of the Federal Rules of Civil Procedure, for an Order:

1. Certifying a Class defined as:

All persons and entities who purchased or acquired the publicly traded common stock of Lannett Company, Inc. (“Lannett” or the “Company”) during the period from July 15, 2014 and October 31, 2017, inclusive (the “Class Period”), and who were damaged thereby (the “Class”). Excluded from the Class are Defendants, the officers and directors of the Company, at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which Defendants have or had a controlling interest.

2. Appointing Plaintiffs as Class Representatives; and

3. Appointing Abraham, Fruchter & Twersky, LLP, previously appointed as Lead Counsel in this action, as Class Counsel.

In support of this Motion, and as more fully set forth in the supporting Memorandum of Law and Declaration of Ian D. Berg and exhibits thereto, filed herewith, Plaintiffs submit that:

1. The Class is so numerous that joinder of all members is impracticable.
2. There are questions of law and fact common to the Class which predominate over any questions solely affecting individual members of the Class.
3. Plaintiffs' claims are typical of the claims of the members of the Class.
4. Plaintiffs will fairly and adequately protect the interests of the members of the Class and have retained counsel competent and experienced in class action and securities litigation. Plaintiffs have no interest antagonistic to or in conflict with the Class.
5. This Class action is superior to other available methods for the fair and efficient adjudication of this controversy.

Dated: October 1, 2020

Respectfully submitted,

s/ Ian D. Berg

Ian D. Berg (PA# 90490)

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